

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)
v.)
CRIMINAL NO. 11-cr-10286-DPW
CATHERINE GREIG,)
Defendant.)

**UNITED STATES' STATUS REPORT
CONCERNING LOCAL RULE 116.5(A)**

The United States files this interim status report in connection with the status conference of the above-captioned matter scheduled for November 29, 2011:

1. At this time, the United States does not seek relief from the otherwise applicable timing requirements imposed by L.R. 116.3.
2. The United States is not aware of any request by the defendant for discovery concerning expert witnesses under Fed. Crim. P. 16(a)(1)(E). The United States has no present intention of calling any expert witnesses in its case in chief. The United States will promptly inform the defendant if its intentions change in this regard.
3. The United States does not anticipate providing additional information related to a witness' criminal record. The United States does anticipate providing additional discovery in connection with the current indictment as a result of the receipt of information, documents, reports of examinations or tests and from materials recently converted into an electronic format for production. To the extent witnesses provide or the United States obtains additional documents during the course of trial preparation, any additional relevant documents provided to counsel for the United States has been, and will continue to be, made available to opposing counsel promptly. The United States has also recently informed the defendant of the additional charges it expects to seek in this matter and the parties are in discussions as to the forum in which those charges will be brought. The parties expect to resolve that issue within the next few weeks, and the United States will then seek the additional charges shortly thereafter. At that time, the United States may produce additional discovery.

4. The United States does not request a motion date to be set under Fed. R. Crim. P. 12(c), and is unaware of whether the defendant seeks such a date.
5. For purposes of the Speedy Trial Act, this court has excluded the following dates:

August 11, 2011 through September 29, 2011 (the time following the defendant's arraignment August 11, 2011 to the date of the initial status conference set for September 29, 2011) (see Dkt. 30); and

September 29, 2011 through November 29, 2011 (the dates between the initial status conference and the final status conference) (Dkt. 45).

Separately, the District Court has excluded the time from October 6, 2011 through May 7, 2012 (the date currently set for trial) (Dkt. 41).

6. It is too early to determine whether plea negotiations will resolve this case. Should this matter proceed to trial, the government anticipates that it would need 15 trial days to present its case in chief.
7. Should the defendant believe an interim status conference is appropriate, with a final status conference to be scheduled later, the United States will assent to the defendant's request, so long as the time period between conferences is excluded under the Speedy Trial Act.

Respectfully submitted,

CARMEN M. ORTIZ
United States Attorney

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CERTIFICATE OF SERVICE

I, Jack W. Pirozzolo, hereby certify that on November 28, 2011, I served a copy of the foregoing motion via electronic filing on counsel for the defendant.

/s/ Jack W. Pirozzolo
Jack W. Pirozzolo